



KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

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March 31, 2021

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501

Dear Chairman Kinneen,

On behalf of the Kuskokwim River Inter-Tribal Fish Commission (KRITFC), I wish to submit comments on Agenda Item D5, “Salmon bycatch,” for the North Pacific Fishery Management Council’s (NPFMC) April 6–10 and April 12–17, 2021 meetings. Specifically, KRITFC urges NPFMC to continue working to reduce Chinook salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial pollock trawl fishery and reduce the maximum prohibited species catch (PSC) limit of Chinook salmon to 17,000 fish.

KRITFC represents the 33 Tribal communities of the Kuskokwim River watershed in Kuskokwim fisheries management. Alongside the U.S. Fish and Wildlife Service (USFWS) at Yukon Delta National Wildlife Refuge (YDNWR) and the Alaska Department of Fish & Game (ADF&G), KRITFC works to manage, conserve, and provide harvest of salmon in the Kuskokwim. Though KRITFC’s management boundaries do not extend into the Bering Sea, the marine habitat of Kuskokwim salmon does; KRITFC is thus invested in BSAI fisheries and bycatch reduction initiatives.

Of primary concern to KRITFC and its member Tribes are Chinook salmon, which are prized among Kuskokwim fishing communities for their nutritional and cultural value and whose numbers have been in dramatic decline since 2009. While historical (1976-2010) subsistence harvest of Chinook salmon throughout the Kuskokwim watershed has averaged around 88,500 fish per year, these harvests have declined 64.5% in the past decade, with an average annual subsistence harvest of 30,200 Chinook salmon between 2011-2020 (J. Simon, 2021). This immense drop in Chinook salmon harvests has affected each of the 33 subsistence communities on this river, especially in terms of food security and cultural survival. Since 2011, Kuskokwim communities from the coast to the headwaters have harvested 50% or less of their Chinook salmon subsistence harvest and food security needs, according to both established, long-term harvest needs numbers and anecdotal evidence of fishermen themselves. Additionally, conservation closures implemented by KRITFC and USFWS to protect Chinook salmon have implemented windows for fishing opportunities, leading many subsistence fishing families to limit time they spend at fish camp, where fisheries and ecosystem knowledge collected over thousands of years is traditionally passed onto youth. These historically low Chinook salmon numbers are

TELIDA | NIKOLAI | TAKOTNA | MCGRATH | LIME VILLAGE | STONY RIVER | SLEETMUTE | RED DEVIL
GEORGETOWN | CROOKED CREEK | NAPAIMUTE | CHUATHBALUK | ANIAK | UPPER KALSKAG | LOWER KALSKAG | TULUKSAK
AKIAK | AKIACHAK | KWETHLUK | BETHEL | OSCARVILLE | NAPASKIAK | NAPAKIAK | KASIGLUK | ATMAUTLUAK
NUNAPITCHUK | TUNTUTULIAK | EEK | QUINHAGAK | KONGIGANAK | KWIGILLINGOK | KIPNUK | CHEFORNAK

negatively impacting subsistence communities' abilities to physically, culturally, and spiritually nourish themselves.

The myriad reasons for Chinook salmon declines in the Kuskokwim watershed cannot be pinned solely on the BSAI commercial pollock fishery. However, when 40% of the 24,984 Chinook salmon bycatch in 2019 were bound for Coastal Western Alaska, according to NPFMC genetic sampling, it is clear that we cannot exonerate BSAI commercial fishing as a cause of regional population declines (Guthrie et al. 2021). Any of those nearly 25,000 Chinook salmon would have been gratefully received by a subsistence fishing family on the Kuskokwim, or on another river in Coastal Western Alaska experiencing similar – if not worse – declines in Chinook salmon populations. The fact that the largest shares of Chinook salmon caught by pollock trawlers were/are bound for Coastal Western Alaska undeniably has an impact on subsistence fishing communities in this region.

KRITFC commends NPFMC for its role in creating and implementing various incentive and management plans to reduce Chinook (and chum) salmon bycatch in the BSAI pollock fishery. Nonetheless, while Chinook salmon bycatch in the BSAI region has decreased since 2011 (NMFS 2021), so have the total numbers of Chinook salmon in this region. A maximum Chinook salmon bycatch limit of 45,000 or 60,000 fish (depending on the 3-river index run reconstruction) is too lenient given the current scarcity of Chinook salmon in Coastal Western Alaska. There simply are too few fish to risk any unintentional catch.

KRITFC urges NPFMC to take stronger action and reduce the maximum PSC limit in BSAI pollock fisheries to 17,000 Chinook salmon during this time of Chinook salmon declines. KRITFC believes this limit is reasonable given that (a) it is approximately half of the current performance standard; and (b) the average Chinook salmon bycatch between 2011-2020 has been just over 17,000 fish (Guthrie et al. 2021). Until Chinook salmon populations in Coastal Western Alaska rebound, any PSC limit higher than 17,000 fish endangers food security, the subsistence economy, and the ecosystem balance of the Kuskokwim watershed and BSAI region.

Kuskokwim subsistence fishing communities have withstood conservation closures – and the threats to food security that accompany them – for nearly a decade in order to rebuild Chinook salmon populations. In order to return to population numbers that allow for unrestricted subsistence and commercial harvest, the commercial fishery must join subsistence families in bearing the load of Chinook salmon conservation. KRITFC strongly supports further action by the NPFMC to limit Chinook salmon bycatch in the BSAI fishery and expects discussion of this issue at its upcoming meetings.

Respectfully,



Mary Peltola
Executive Director, KRITFC